

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MIGUEL PABLO QUINONES, Individually,

Plaintiff,

Plaintiff,

-against-

CITY OF NEW YORK, NEW YORK POLICE
DEPARTMENT, DETECTIVE URENA, "JOHN DOE
#1, "JOHN DOE #2,"JOHN DOE #3, "JOHN DOE #4,
JOHN DOE #5,"

Defendants,

**NOTICE OF MOTION TO
WITHDRAW AS COUNSEL
AND PETITION TO ENFORCE
CHARGING LIEN**

10-CV-6195 (JGK)

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PLEASE TAKE NOTICE that the undersigned attorney for plaintiff, shall move before the Honorable James L. Cott. on January 4, 2012 at 2:00 p.m. or as soon thereafter as counsel may be heard for an Order granting attorney, Richard D. Borzouye, to be relieved as counsel for plaintiff and for the Court to order a Charging lien on any settlement, judgment or verdict in the above-captioned matter.

We shall rely upon the attached Affirmation of Counsel in support hereof.

WE HEREBY CERTIFY that the original of the within Notice of Motion has been filed with the Clerk and a copy of same has been transmitted to counsel for plaintiffs and to defendants.

THE BORZOUYE LAW FIRM, P.C.

BY: /S/

RICHARD D. BORZOUYE, ESQ. (RB 3461)
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New York, NY 10005
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Attorneys for Plaintiff

DATED: January 2, 2012